

# HINKLE, COX, EATON, COFFIELD & HENSLEY

ATTORNEYS AT LAW

218 MONTEZUMA

POST OFFICE BOX 2068

SANTA FE, NEW MEXICO 87504-2068

(505) 982-4554

FAX (505) 982-8623

CLARENCE E. HINKLE (1909-1985)  
W. E. BONDURANT, JR. (1913-1973)  
ROY C. SNODGRASS, JR. (1914-1987)

OF COUNSEL  
O. M. CALHOUN\*  
MACK EASLEY  
JOE W. WOOD  
RICHARD S. MORRIS

WASHINGTON, D.C.  
SPECIAL COUNSEL  
ALAN J. STATMAN

700 UNITED BANK PLAZA  
POST OFFICE BOX 10  
ROSWELL, NEW MEXICO 88202  
(505) 622-6510  
FAX (505) 623-9332

2800 CLAYDESTA CENTER  
6 DESTA DRIVE  
POST OFFICE BOX 3580  
MIDLAND, TEXAS 79702  
(915) 683-4691  
FAX (915) 683-6518

1700 TEAM BANK BUILDING  
POST OFFICE BOX 9238  
AMARILLO, TEXAS 79105  
(806) 372-5569  
FAX (806) 372-9761

500 MARQUETTE N.W., SUITE 800  
POST OFFICE BOX 2043  
ALBUQUERQUE, NEW MEXICO 87103  
(505) 768-1500  
FAX (505) 768-1529

LEWIS J. COX  
PAUL W. EATON  
CONRAD E. COFFIELD  
HAROLD L. HENSLEY JR.  
CLAYTON D. SHANDOR  
ERIC D. JAMPHERE  
C. D. MARTIN  
PAUL J. KELLY JR.  
ROBERT P. TUNNIN JR.  
MARSHALL S. MARTIN  
OWEN M. LOPEZ  
DOUGLAS L. LUNSFORD  
JOHN J. KELLY  
NICHOLAS J. NOEDING  
T. CALDER EZZELL JR.  
WILLIAM B. BURFORD\*  
RICHARD E. OLSON  
RICHARD R. WILFONG\*  
THOMAS J. MCBRIDE  
STEVEN D. ARNOLD  
JAMES J. WECHSLER  
NANCY S. CUSACK  
JEFFREY L. FORNACIAR  
JEFFREY D. HEWITT  
JAMES BRUCE  
JERRY F. SHACKELFORD\*  
JEFFREY W. HELLBERG\*  
ALBERT L. PITTS  
THOMAS M. HNASKO  
JOHN C. CHAMBERS\*  
GARY D. COMPTON\*  
MICHAEL A. GROSS  
THOMAS C. HAINES JR.  
GREGORY J. NIBERT  
DAVID T. MARWETTE\*  
MARY C. DOW

KAREN M. RICHARDSON\*  
FRED W. SCHWEND MANN  
JAMES M. HUDSON  
JEFFREY S. BARDI  
MACDONALD GORDON  
REBECCA NICHOLS JOHNSON  
WILLIAM P. JOHNSON  
STANLEY P. KOTOLSKY JR.  
H. R. THOMAS  
KARA L. KELLOGG  
BETTY H. LITTLE\*  
RUTH S. MUSGRAVE  
ELLEN S. CASEY  
S. BARRY PAISNER  
MARGARET CARTER LUDEWIG  
STEPHEN M. CRANFORD  
MARTIN MEYERS  
GREGORY S. WHEELER  
ANDREW J. CLOUTER  
JAMES A. SULLESZ E  
GARY W. LARSON  
STEPHANE JANDRY  
JOHN R. KUSSETH JR.  
MARGARET R. MCNETT  
BRIAN T. CARTWRIGHT\*  
LISA A. SMITH\*  
JAMES KENT SCHISTER\*  
ROBERT H. BETHLE\*  
BRADLEY W. HOWARD  
CHARLES A. SUTTER\*  
NORMAN D. ENAR  
GARRETT T. BROCK\*  
MOLLY MCNOSH

\*NOT LICENSED IN NEW MEXICO

January 25, 1993

## VIA HAND DELIVERY

Florene Davidson  
Oil Conservation Division  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87503

Re: Case No. 10,635

Dear Florene:

Enclosed is an Amended Application in the above matter, which I asked you to advertise for the February 18 hearing. The original Application requested pooling from the base of the San Andres formation, while the Amended Application requests pooling from 500 feet below the top of the San Andres formation. Please call me if you have any questions.

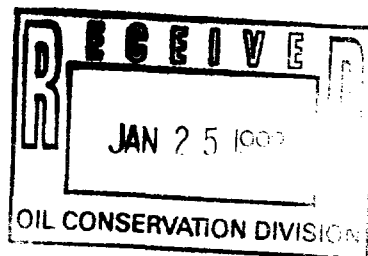
Very truly yours,

HINKLE, COX, EATON, COFFIELD  
& HENSLEY

James Bruce

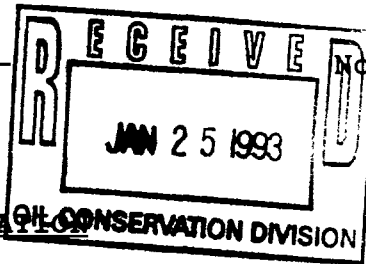
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BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF MEWBOURNE OIL COMPANY  
FOR COMPULSORY POOLING AND AN UNORTHODOX GAS WELL LOCATION, EDDY COUNTY,  
NEW MEXICO.



AMENDED APPLICATION

Mewbourne Oil Company hereby makes application for an order pooling all mineral interests from 500 feet below the top of the San Andres formation to the base of the Morrow formation underlying the E $\frac{1}{2}$  of Section 15, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and for an unorthodox gas well location, and in support thereof states:

1. Applicant is an interest owner and has the right to drill a well in the E $\frac{1}{2}$  of said Section 15.

2. Applicant proposes to drill its Turkey Track "15" State No. 2 Well in the E $\frac{1}{2}$  of Section 15, at an unorthodox location 1,500 feet from the South line and 1,980 feet from the East line of the Section, to a depth sufficient to test the Morrow formation (approximately 11,000 feet), and seeks to dedicate the following acreage to the well:

(a) The E $\frac{1}{2}$  of Section 15 for all pools or formations spaced on 320 acres;

(b) The SE $\frac{1}{4}$  of Section 15 for all pools or formations spaced on 160 acres;

(c) The W $\frac{1}{2}$ SE $\frac{1}{4}$  of Section 15 for all pools or formations spaced on 80 acres; and

(d) The NW $\frac{1}{4}$ SE $\frac{1}{4}$  of Section 15 for all pools or formations spaced on 40 acres.

3. Applicant has in good faith sought to join all other mineral or leasehold interest owners in the E $\frac{1}{2}$  of Section 15 for the purposes set forth herein.

4. Although Applicant attempted to obtain voluntary agreements from all mineral or leasehold interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their acreage. Therefore, Applicant seeks an order pooling all mineral and leasehold interest owners underlying the E $\frac{1}{2}$  of Section 15, as described above, pursuant to N.M. Stat. Ann. § 70-2-17 (1987 Repl.).

5. Applicant requests the Division to consider the cost of drilling and completing the well, the allocation of the cost thereof, as well as actual operating charges and costs charged for supervision. Applicant requests that it be designated as operator of the well and that the Division set a penalty of 200% for the risk involved in drilling the well.

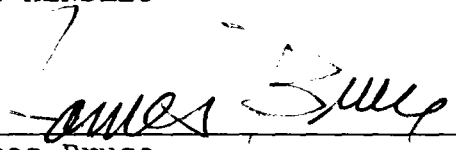
6. The pooling of all interests underlying the E $\frac{1}{2}$  of Section 15, as described above, and the approval of the unorthodox gas well location will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, Applicant requests that the Division grant the relief requested above.

Dated: January 25, 1993.

Respectfully submitted,

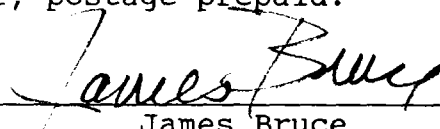
HINKLE, COX, EATON, COFFIELD  
& HENSLEY

  
\_\_\_\_\_  
James Bruce  
Post Office Box 2068  
Santa Fe, New Mexico 87504-2068  
(505) 982-4554

Attorneys for Applicant

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Amended Application was mailed to William F. Carr, Esq., Post Office Box 2208, Santa Fe, New Mexico 87504-2208, this 25th day of January, 1993, by first-class mail, postage prepaid.

  
\_\_\_\_\_  
James Bruce